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August 12, 2020

VIA ECF

The Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Judge Brodie:

We represent Roger Ng in the above-referenced case and write jointly with the government to propose a briefing schedule to the Court. This case is currently scheduled for jury selection on January 19, 2021. We jointly propose the following schedule to be So Ordered by the Court:

Dispositive/Discovery Motions Deadline:

10/2 – Defense Motions Due

10/23 – Government Opposition Due

10/30 – Defense Reply Due

Trial Motions (*in limine*/404(b)) Deadline:

12/2 – Defense/Government Motions Due

12/16 – Oppositions Due

12/23 – Replies due

The defense respectfully requests leave to file further motions *in limine* after we receive § 3500 material and government exhibits.

BRAFMAN & ASSOCIATES, P.C.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marc A. Agnifilo', written in a cursive style.

Marc A. Agnifilo, Esq., *Of Counsel*

Teny R. Geragos, Esq.

Jacob Kaplan, Esq.

cc: All Counsel (via ECF)